

FILED

OCT 19 2022

U. S. DISTRICT COURT
EASTERN DISTRICT OF MO
ST. LOUIS

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

v.

DONYE PEACE, a/k/a “El Baggo,”

Defendant.

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4:22CR580 MTS/NCC

MOTION FOR PRETRIAL DETENTION AND HEARING

The United States of America, by and through its Attorneys, Sayler A. Fleming, United States Attorney for the Eastern District of Missouri, and C. Ryan Finlen, Assistant United States Attorney for said District, and moves the Court to order Defendant detained pending trial pursuant to Title 18, United States Code, §3141, et seq.

As and for its grounds, the United States of America states as follows:

1. Defendant is named in nine counts, including four distribution of cocaine charges, two § 924(c) charges, and for unlicensed dealing in firearms.

2. The brazen nature of Defendant’s conduct underscores the danger he poses to the community if released. Defendant advertised his controlled substance sales through links from his publicly-available Instagram page. Once anyone, including undercover ATF agents clicked on the right link, they were taken to defendant’s “Local Pharmacy” page. After responding to Defendant’s advertisement, Defendant met up with the would-be purchaser in a public shopping center to sell cocaine.

3. Defendant tacitly acknowledged the dangerousness of his activities by bringing co-defendants along for extra protection. On August 26, 2022, Defendant was accompanied by co-defendant James to the sale. On September 7, 2022, Defendant was accompanied by co-defendant

Patterson. And, on September 15, co-defendant Bradford stood guard on a residential street corner outside the car armed with an AR-15.

4. Furthermore, Defendant's release would only perpetuate to the danger to the community posed by Defendant's unlicensed firearms trafficking. After the success of Defendant's "Local Pharmacy" advertisements, Defendant created a "LocalAmmunitions" page. From there, anyone could contact Defendant in hopes of buying firearms with the formalities of a background check required during licensed transactions.

5. The weight of the evidence is substantial, because the transactions for which Defendant is charged were captured on camera worn by the undercover ATF agent purchasing the cocaine and firearms.

WHEREFORE, the United States requests this Court to order Defendant detained prior to trial.

Respectfully submitted,

SAYLER A. FLEMING
United States Attorney

s/ C. Ryan Finlen
C. RYAN FINLEN, #6305918(IL)
Assistant United States Attorney